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7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 DANIEL LEE RHEES,

14 Defendant.  
15

Case No. 2:23-cr-00017-APG-NJK

**STIPULATION TO CONTINUE  
RESTITUTION HEARING FOR  
VICTIMS 1 AND 2**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Sigal  
18 Chattah, United States Attorney, and Afroza Yeasmin, Assistant United States  
19 Attorney, counsel for the United States of America, and Rene L. Valladares,  
20 Federal Public Defender, and Keisha K. Matthews, Assistant Federal Public  
21 Defender, counsel for Daniel Lee Rhees, and Ellie Roohani, Esq., counsel for  
22 Victims 1 and 2 that the Restitution Hearing currently scheduled for June 24, 2025  
23 at 1:30pm, be vacated and continued at least sixty (60) days to a date and time  
24 convenient to the Court.

25 This Stipulation is entered into for the following reasons:  
26

1           1.     Ms. Roohani has retained an expert to produce a report for the Court's  
2 consideration as related to Victims 1 and 2.

3           2.     Although the expert has not drafted her report at this time, Ms.  
4 Roohani has communicated the general substance of the expert's conclusions to  
5 Ms. Matthews and Ms. Yeasmin.

6           3.     The Parties have been negotiating a restitution agreement.

7           4.     While the Parties have reached an agreement in principle, the Parties  
8 need additional time to finalize the specifics of the agreement.

9           5.     If the Parties are able to finalize such an agreement, it will obviate  
10 the need for a restitution hearing as related to Victims 1 and 2.

11          6.     If the Parties are unable to finalize such an agreement, the retained  
12 expert will need time to prepare her report, and the Parties will need time to review  
13 that report.

14          7.     The Government does not object to the continuance.

15          8.     Victims 1 and 2 do not object to the continuance.

16          9.     Mr. Rhees does not object to the continuance.

17          10.    Mr. Rhees agrees that any additional time excluded by this  
18 stipulation will not cause actual prejudice to him.

19          11.    This continuance is not sought for purposes of delay, but to allow for  
20 adequate time to prepare for the restitution hearing.

21          12.    Denial of this request could result in a miscarriage of justice, and the  
22 ends of justice served by granting this request outweigh the best interest of the  
23 public in a speedy resolution to this case.

24          13.    Mr. Rhees and Victims 1 and 2 waive any right to a restitution  
25 hearing within 90 days of the sentencing date as contemplated in 18 U.S.C. §  
26

3664(d)(5), and ask that the Court exclude the time requested by this continuance in computing such time.

This is the first request for continuance filed herein.

DATED this 29th day of May 2025.

RENE L. VALLADARES  
Federal Public Defender

SIGAH CHATTAH  
United States Attorney

*/s/ Keisha K. Matthews*  
By \_\_\_\_\_

*/s/ Afroza Yeasmin*  
By \_\_\_\_\_

KEISHA K. MATTHEWS  
Assistant Federal Public Defender

AFROZA YEASMIN  
Assistant United States Attorney

*/s/ Ellie Roohani*  
By \_\_\_\_\_  
ELLIE ROOHANI, ESQ.  
Counsel for Victims 1 and 2

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4

5 Plaintiff,

6 v.

7 DANIEL LEE RHEES,  
8

9 Defendant.

Case No. 2:23-cr-00017-APG-NJK

**ORDER**

10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Restitution Hearing for Victims 1  
12 and 2 currently scheduled on June 24, 2025, at the hour of 1:30 p.m., be vacated  
13 and continued to September 3, 2025, at the hour of 9:30 a.m. in Courtroom 6C.  
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15 DATED this 30th day of May 2025.

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18 ANDREW P. GORDON  
19 CHIEF U.S. DISTRICT JUDGE  
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